

**TOKI R. CAMERON**  
On Behalf of Herself  
All Others Similarly Situated,  
Plaintiff,

VS.

**ELDERCARE MANAGEMENT  
SERVICS, INC. et al**

Defendants.

Case No.: 2:10-cv-04219-NKL

**JOINT MOTION FOR EXTENSION OF TIME TO BRIEF CONDITIONAL  
CERTIFICATION OF COLLECTIVE ACTION**

The parties respectfully request a 21-day extension of the current briefing schedule for conditional collective action certification, and in support of this joint motion state as follows:

1. Plaintiff filed this case, on October 5, 2010, seeking to recover unpaid wages and overtime on behalf of herself and other similarly situated current and former employees of Defendants' nursing homes in Missouri, under the Fair Labor Standards Act and Missouri wage and common laws;
2. Defendants deny any unlawful wage practices and deny that Plaintiff is similarly situated to the putative class and collective group of current and former employees;

3. Despite these contrary positions, the parties have reached a tentative settlement agreement;
4. The parties believe it is in their collective best interests, as well as the interests of the Court and judicial economy, to postpone briefing of conditional certification for 21 days to allow the parties time to finalize their settlement agreement;
5. Pursuant to this Court's Scheduling Order, Plaintiff's conditional certification motion is currently due April 15, 2011; Defendants' opposition brief is due April 29, 2011; Plaintiff's reply brief is due May 13, 2011 (Doc. 49);
6. This motion is timely as it is filed prior to the deadlines the parties seek to extend;
7. This is the parties' first request to extend this briefing schedule, and the parties do not believe a 21-day extension to allow for settlement will impact the current January 23, 2012 trial setting;
8. The sole purpose of this joint motion is to allow for an efficient resolution of this matter, and the parties do not intend to cause any undue delay.

For these reasons, the parties respectfully seek this Court's order extending the briefing schedule for conditional certification by 21 days.

Dated: April 14, 2011

Respectfully Submitted,

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**Certificate of Service**

I hereby certify that a true and correct copy of the above and foregoing was sent on April 14, 2011 via email address as registered with the Court and under the requirements set forth by the Western District of Missouri under the policies for ECF Management and standing Orders to:

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